

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

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PETER OPPENEER
CLERK US DIST COURT

UNITED STATES OF AMERICA

SUPERSEDING INDICTMENT

v.

Case No. 16-cr-00009-wmc

LOC BUI, PETER NGUYEN aka Phi Ta,
QUAN TRAN, and THAY KHA DANH,

21 U.S.C. § 841(a)(1)
21 U.S.C. § 846
18 U.S.C. 1956(a)(1)(B)(i)

Defendants.

THE GRAND JURY CHARGES:

COUNT 1

1. From on or about December 12, 2012, through on or about February 10, 2015, in the Western District of Wisconsin and elsewhere, the defendants,

LOC BUI, PETER NGUYEN aka Phi Ta,
QUAN TRAN, and THAY KHA DANH,

conspired with each other, with KYLE D. LUX, STEVENSON TRAN, and with others, known and unknown to the grand jury, to knowingly and intentionally possess with the intent to distribute and to distribute 100 kilograms or more of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. It was part of this conspiracy that LOC BUI, PETER NGUYEN, QUAN TRAN, THAY KHA DANH, STEVENSON TRAN, and KYLE D. LUX, obtained marijuana from the State of Oregon and transported the marijuana to the Western

District of Wisconsin and elsewhere for distribution.

3. It was further part of this conspiracy that LOC BUI, PETER NGUYEN, KYLE D. LUX, and others, unknown to the grand jury, shipped parcels containing marijuana from the State of Oregon to the Western District of Wisconsin and elsewhere.

4. It was further part of this conspiracy that LOC BUI, PETER NGUYEN, THAY KHA DANH, KYLE D. LUX, and STEVENSON TRAN, and others, known and unknown to the grand jury, received and arranged the receipt of marijuana in the Western District of Wisconsin and elsewhere for delivery to local marijuana sub-distributors.

5. It was further part of this conspiracy that LOC BUI, PETER NGUYEN, and KYLE D. LUX, and others, known and unknown to the grand jury, opened bank accounts at financial institutions, namely, Wells Fargo Bank, U.S. Bank, JP Morgan Chase Bank, and Bank of America, that had branches in the Portland, Oregon area, in the Western District of Wisconsin, and in the other States where the marijuana was shipped.

6. It was further part of this conspiracy that LOC BUI, PETER NGUYEN, THAY KHA DANH, and KYLE D. LUX, STEVENSON TRAN, directly and through others, known and unknown to the grand jury, deposited in total more than \$2,000,000 in cash marijuana proceeds into the bank accounts described in the preceding paragraph with these deposits occurring in the States to which the marijuana had been shipped.

7. It was further part of this conspiracy that LOC BUI, KYLE D. LUX, and STEVENSON TRAN, and others, known and unknown to the grand jury, deposited, and directed others to deposit into the bank accounts described above, cash marijuana sale proceeds in amounts less than \$10,000 in an attempt to prevent the financial institutions from reporting the cash transactions exceeding \$10,000 as required by federal law.

8. It was further part of this conspiracy that THAY KHA DANH deposited marijuana proceeds into UW Credit Union and Wells Fargo Bank accounts in Madison, Wisconsin and then directed that the marijuana proceeds be transferred by electronic funds transfer to bank accounts controlled by LOC BUI.

(All in violation of Title 21, United States Code, Section 846).

COUNTS 2 - 24

1. The grand jury re-alleges here paragraphs 1 through 9 of Count 1 of this indictment.

2. On or about the dates set forth below, in the Western District of Wisconsin and elsewhere, the defendants listed in the particular count, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, knowingly conducted and attempted to conduct the following financial transactions which affected interstate commerce, and which in fact involved the proceeds of a specified unlawful activity, namely, the unlawful distribution of marijuana, a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), with the intent to conceal and disguise the nature, location,

source, ownership, and control of the proceeds.

COUNT	DATE	DEFENDANT(S)	FINANCIAL TRANSACTION
2	May 20, 2013	LOC BUI	\$5,000 deposit at the Hilldale Madison, Wisconsin, US Bank branch, into the "Rose City Medical MFG Inc." account
3	May 20, 2013	LOC BUI	\$5,000 deposit at the Capitol Square, Madison, Wisconsin, US Bank branch into the "Rose City Medical Supply Inc." account
4	July 11, 2013	LOC BUI and THAY KHA DANH	\$15,000 electronic funds transfer from a UW Credit account controlled by DANH to a Key Bank account controlled by BUI
5	July 12, 2013	LOC BUI and THAY KHA DANH	\$20,000 electronic funds transfer from a Wells Fargo account controlled by DANH to a Key Bank account controlled by BUI
6	May 10, 2014	LOC BUI	\$4,500 deposit at the University Avenue Middleton, Wisconsin, Wells Fargo branch into the "Columbia Floor Supplies, Inc." account
7	May 10, 2014	LOC BUI	\$3,000 deposit at the University Avenue, Middleton, Wisconsin, Wells Fargo branch into the "Columbia Floor Supplies, Inc." account
8	May 12, 2014	LOC BUI	\$7,000 deposit at the University Avenue, Middleton, Wisconsin, Wells Fargo branch into the "Columbia Floor Supplies, Inc." account
9	May 12, 2014	LOC BUI and QUAN TRAN	\$5,000 deposit at the University Avenue, Middleton, Wisconsin, Wells Fargo branch into QUAN TRAN's account
10	August 8, 2014	PETER NGUYEN	\$5,000 deposit at the Fitchburg,

			Wisconsin, US Bank branch into the "P & L Construction Services, Inc.," account
11	August 8, 2014	PETER NGUYEN	\$5,000 deposit at the West Towne, Madison, Wisconsin, US Bank branch into the "P&L Construction Services, Inc.," account
12	August 8, 2014	PETER NGUYEN	\$5,600 deposit at the University Avenue, Middleton, Wisconsin, Wells Fargo branch into the "P&L Construction Services, Inc.," account
13	August 8, 2014	PETER NGUYEN	\$8,000 deposit at the East Towne, Madison, Wisconsin, Wells Fargo branch into the "P&L Construction Services, Inc.," account
14	August 8, 2014	PETER NGUYEN and LOC BUI	\$4,000 deposit at the University Avenue, Middleton, Wisconsin, Wells Fargo branch into the "U.A.P." account
15	August 18, 2014	PETER NGUYEN	\$8,000 deposit at the University Avenue, Middleton, Wisconsin, Wells Fargo branch into the "P&L Construction Services, Inc.," account
16	August 18, 2014	PETER NGUYEN	\$9,000 deposit at the West Towne, Madison, Wisconsin, US Bank branch into the "P&L Construction Services, Inc.," account
17	September 17, 2014	THAY KHA DANH	\$500 deposit at the Gammon Road, Madison, Wisconsin, Wells Fargo branch into the "Y.N.T.L." account
18	September 23, 2014	PETER NGUYEN	\$7,000 deposit at the University Avenue, Middleton, Wisconsin, Wells Fargo branch into the "P&L Construction Services, Inc.," account
19	September 30,	THAY KHA	\$1,000 deposit at the University

	2014	DANH	Avenue, Middleton, Wisconsin, Wells Fargo branch into the "Y.N.T.L." account
20	October 3, 2014	LOC BUI	\$5,000 deposit at the Gammon Road, Madison, Wisconsin, Wells Fargo branch into the "N.N.T." account
21	October 8, 2014	LOC BUI and QUAN TRAN	\$6,000 deposit at the University Avenue, Middleton, Wisconsin Wells Fargo branch into QUAN TRAN's account
22	October 14, 2014	PETER NGUYEN	\$9,600 deposit at the University Avenue, Middleton, Wisconsin, Wells Fargo branch into the "P&L Construction Services, Inc.," account
23	October 23, 2014	LOC BUI and PETER NGUYEN	\$5,600 deposit at the University Avenue, Middleton, Wisconsin, Wells Fargo branch into the "U.A.P." account
24	October 23, 2014	LOC BUI and PETER NGUYEN	\$8,000 deposit at the East Towne, Madison, Wisconsin, Wells Fargo branch into the "P&L Construction Services, Inc.," account

(In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and Title 18, United States Code, Section 2).

COUNT 25

On or about October 21, 2014, in the Western District of Wisconsin, the defendant,

LOC BUI,

knowingly and intentionally possessed with the intent to distribute a mixture or substance containing marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1) and

Title 18, United States Code, Section 2).

COUNT 26

On or about October 23, 2014, in the Western District of Wisconsin, the
defendant,

LOC BUI,

knowingly and intentionally possessed with the intent to distribute a mixture or
substance containing marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1) and
Title 18, United States Code, Section 2).

COUNT 27

On or about December 1, 2014, in the Western District of Wisconsin, the
defendant,

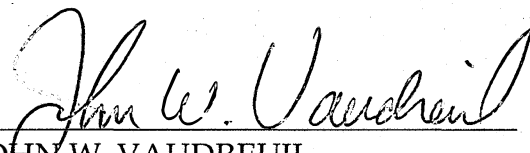
THAY KHA DANH,

knowingly and intentionally possessed with the intent to distribute a mixture or
substance containing marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

A TRUE BILL


PRESIDING JUROR


JOHN W. VAUDREUIL
United States Attorney

Indictment returned: 8/4/2016